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2 7, the order that I'm presenting them
3 to you is the order in which these
4 documents were provided to the
5 government by Chase. I didn't put
6 the order together, and you should be
7 able to see that with the number on
8 the bottom of each page of this
9 exhibit starting with SB. No, sorry.
10 The number on the bottom right. See
11 where it says 132 on the last page?
12 That's the page numbers that were
13 provided to us by Chase. That's just
14 an FYI. Amy, you can take that down.
15 (So doing.)

16 Q. Mr. Leleux, I'm just going to change
17 up topics, okay?

18 A. Yes, sir.

19 Q. I'm going to ask about a time period
20 from December of 2020 to the beginning of
21 July '21, okay?

22 A. Yes, sir.

23 Q. I'm going to ask about the marketing
24 of the FRT-15, okay?

25 A. Okay.

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2 Q. And the FRT-15 is the Forced Reset
3 Trigger that RBT was selling, right?

4 A. That Rare Breed Triggers was
5 selling, yes, sir.

6 Q. In the public marketing of the
7 FRT-15, was there any mention of the FRT
8 being submitted to the ATF for
9 classification?

10 A. No, sir.

11 Q. Was there any mention during that
12 time period in marketing for the FRT-15 of
13 the AR-1?

14 A. In the beginning, I don't know that
15 anyone at RBT really knew what the AR-1
16 really fully was, so it absolutely was not
17 mentioned. And again, it was -- and I just
18 want to make sure you are okay with this, but
19 I don't want to answer a yes or a no where I
20 feel like it's leaving out of context.

21 Q. Please do. Go ahead.

22 A. The answer is no, we didn't mention
23 the AR-1. But, A, in the beginning, I don't
24 think any of us really knew what the AR-1
25 was. And, B, once we found out what it was,

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2 it was different and worked differently and
3 functioned differently and wasn't relevant to
4 what we were doing.

5 Q. Let me ask you about that. How do
6 you think the AR-1 is different?

7 A. It's different for patent purposes
8 because the trigger makes direct rigid
9 mechanical contact with the bolt carrier.
10 And instead of on the FRT-15, the bolt
11 carrier makes contact with the hammer, which
12 then makes contact with the trigger. And
13 that's, again, kind of a nuance difference,
14 but then think about the 3MR where it's bolt
15 carrier to hammer to the little arm that
16 flies up to trigger. So the 3MR is,
17 essentially -- that portion of it, the same
18 things are happening, but it's different. So
19 that's one difference. And then the other
20 primary difference is that the FRT-15 had a
21 locking bar, which prevented the possibility
22 of hammer follow. And let me clarify. It
23 doesn't preclude hammer follow, what it
24 precludes is hammer follow that could result
25 in automatic fire. Because you can get

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2 hammer follow with an FRT-15, but it's only
3 because there is not enough gas to cycle the
4 gun, so it didn't force the reset. And the
5 hammer follows, but it can only result in a
6 failure, it can't result in automatic fire.
7 And that's what I meant earlier when I said
8 hammer follow, if properly timed, could
9 result in automatic fire as to where once you
10 have that locking bar, there is no way for it
11 to be properly timed and accidentally result
12 in the automatic fire, it's not possible.

13 Q. Any other differences between the
14 AR-1 and the FRT-15 in your view?

15 A. I mean, I think I told you before.
16 To accomplish the idea of the bolt making
17 direct rigid mechanical contact with the
18 trigger itself, it required a modified bolt
19 and a few different parts. But again, I've
20 never actually looked at the AR-1 in-person.
21 I've only seen now the pictures and stuff
22 that were submitted in the administrative
23 record in the case in Florida. So I have
24 seen the pictures of it. It looks like a
25 welded together mess, but my understanding of

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2 the mechanics mostly come from the
3 intellectual property lawsuit stuff.

4 Q. The next set of questions I'm not
5 limiting it to timeframe, so you may answer
6 the question in a way that suggests that
7 things changed over time. What was Rare
8 Breed Triggers' policy for refunds with
9 respect to the FRT-15?

10 A. Okay. So all of the questions about
11 Rare Breed Triggers -- and if you want me to
12 keep repeating this every time, I will, but I
13 am going to tell you my understanding of it
14 as a consultant. And I, obviously, was
15 involved quite a bit in conversations, but I
16 didn't necessarily hit go on the final thing.
17 So I don't have the final verbiage a hundred
18 percent, but I will give you my
19 understanding.

20 Q. Yes, and I will accept that. We
21 will accept all of that. And if you need to
22 make any further limitations or caveats in
23 any particular questions, please do, okay?

24 A. Okay. So my understanding of the
25 refund policy from day one was there are no